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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Bass Underwriters, Inc.,

Plaintiff

v.

David Kono,

Defendant.

Case No: 2:22-cv-00138-RFB-EJY

**STIPULATION AND ORDER TO  
CONTINUE THE DISPOSITIVE  
MOTIONS DEADLINE**

**(SECOND REQUEST)**

Plaintiff Bass Underwriters, Inc. ("Bass") and Defendant David Kono ("Kono") stipulate for a continuation, the parties' second request, of the dispositive motions deadline, and in support whereof aver as follows:

1. On January 6, 2023, Bass moved on an emergency basis for leave to file an amended complaint to assert claims against Brooks, and to continue the discovery period. ECF No. 35. Kono filed his response on January 20, 2023 (ECF No. 37), and Bass filed a reply in support of its motion on January 31, 2023 (ECF No. 47). The Court issued an Order, denying the emergency status of the motion (ECF No. 36). This motion is currently pending before the Court.

2. On January 24, 2023, Kono moved, on an emergency basis, for a protective order precluding the deposition of Kono's employer, Brooks Group Insurance Agency, LLC's ("Brooks") corporate representative (ECF No. 39). Bass filed its response in opposition to this motion on February 6, 2023 (ECF No. 49), and Kono replied on February 13, 2023. The Court issued an Order, addressing the emergency request of the motion by staying Brooks' deposition until the motion is ruled upon (ECF No. 40). This motion is currently pending before the Court, and, as such, the deposition has not yet occurred.

3. While these motions remain pending, the March 15, 2023 deadline filing dispositive motions remains in force (ECF No. 52).

4. Before moving the court for the requested extension, the parties wanted to wait until a week before the deadline to allow for court's resolution of the aforementioned motions. Thus, excusable neglect exists for this requested extension.

5. The parties have conferred and, due to the several motions pending before the Court, for judicial efficiency, and the economy of the parties, the parties agree to a continuation of the dispositive motions deadline to April 15, 2023.

6. This stipulation is for good cause, supported by excusable neglect, and is not for purposes of delay.

**IT IS SO STIPULATED.**

Dated: March 8, 2023

Dated: March 8, 2023

/s/ Karl O. Riley  
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**ORDER**

For good cause appearing,

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 9th day of March, 2023.

Dated: \_\_\_\_\_